IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	*	
	*	
V.	*	7:14-mj-00912
	*	
RUBEN LEMUS	*	

In re: MONICA MORALES-LOPEZ
DORITA SANCHEZ-SANCHEZ

MOTION TO DEPOSE MATERIAL WITNESS

COME NOW, **MONICA MORALES-LOPEZ** and **DORITA SANCHEZ-SANCHEZ** and files this their ***Motion to Depose Material Witnesses***, pursuant to 18 USC 3144 and Rule 15 F.R.Cr.P. and for cause would show the Court the following:

I.

On or about May 9, 2014, **MONICA MORALEZ-LOPEZ** and **DORITA SANCHEZ-SANCHEZ**, were ordered held as material witnesses in Magistrate Case No.: 7:14-mj-00912. Material witnesses were are without bond and are currently being detained at the Brooks County Detention Center in Falfurrias, TX.

II.

MONICA MORALEZ-LOPEZ and **DORITA SANCHEZ-SANCHEZ**, invoke Federal Rule of Criminal Procedure Rule 15(a) and pray that a deposition of their testimony be taken as soon as is practical, and that upon such deposition being completed, they be released and/or deported to their home country.

III.

The material witnesses' testimony can be secured by deposition.

Movants state they are indigent, and ask the Court that all costs herein be paid by the Government.

WHEREFORE, PREMISES CONSIDERED, movants pray this Court to order depositions, that a time and place be designated in order that adequate notice be accomplished, and that all costs be taxed against the Government, and for such further relief that the court may deem appropriate.

Respectfully submitted
Law office of Baldemar Garza and
Minerva Garza, PLLC
200 E. Second Street
Rio Grande City, Texas 78582
Tel: (956) 487-7131
Fax: (956) 487-8806

By: ____________________
Baldemar Garza
State Bar No. 07730300
garzalawoffice@aol.com

CERTIFICATE OF SERVICE

I, Baldemar Garza, do hereby certify that on the ____ day of May, 2014, a copy of the foregoing ***Motion to Depose Material Witnesses*** of the material witnesses, **MONICA MORALEZ-LOPEZ** and **DORITA SANCHEZ-SANCHEZ** was forwarded via electronic filing to Terry Leonard, United States Attorney's Office, at 1701 W Highway 83, Suite 600, McAllen, Texas 78501 and Kyle Welch, Public Defender's Office, at 1701 W. Business Hwy. 83, McAllen, Texas.

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Baldemar Garza
State Bar No. 07730300

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ORDER

On the ___ day of ________________, 2014, came on to be heard the Material Witnesses **MONICA MORALEZ-LOPEZ** and **DORITA SANCHEZ-SANCHEZ'S** motion to have their depositions taken by the Government and the defendant, having considered the same, this Court is of the opinion that it should be in all things GRANTED. Depositions will be taken on __________________, 2014 at ___ _.m.

Done at McAllen, Texas, this the ____ day of _______________, 2014.

____
JUDGE PRESIDING